

From: [Ari Savitzky](#)
To: [Rex Shannon](#); [Michael B. Wallace \(mbw@wisecarter.com\)](#); [Gerald Kucia](#)
Cc: [jyoungwood@stblaw.com](#); [External - Leslie Jones](#); [Joshua Tom](#); [Ming Cheung](#)
Subject: Re: Deposition Dates in White v. SBEC
Date: Tuesday, September 19, 2023 7:49:14 PM

Mike and all:

Thanks for your letter. We would like to proceed with depositions of your experts. We can do so where they are located to obviate the need for them to travel, and we otherwise understand the requirement under the rules to pay the expert being deposed a reasonable fee for their time in connection with the deposition. As we understand it, that requirement does not extend to travel costs that may be associated with the deposition of an out-of-state expert.

As for Dr. Bonneau, we can make either the 28th or the 29th work. Please let us know if you or Dr. Bonneau have a preference there.

As for Dr. Swanson, and per your letter, we can make some date after 10/2 work. We will await your further word re: his availability that week.

Thanks,

Ari

From: Ari Savitzky <asavitzky@aclu.org>
Sent: Friday, September 15, 2023 11:19:19 AM
To: Rex Shannon <Rex.Shannon@ago.ms.gov>; Michael B. Wallace (mbw@wisecarter.com) <mbw@wisecarter.com>; Gerald Kucia <Gerald.Kucia@ago.ms.gov>
Cc: jyoungwood@stblaw.com <jyoungwood@stblaw.com>; External - Leslie Jones <leslie.jones@splcenter.org>; Joshua Tom <JTom@aclu-ms.org>; Ming Cheung <MCheung@aclu.org>
Subject: Deposition Dates in White v. SBEC

Rex, Gerald, and Mike:

I hope you are all doing well.

With their sur-rebuttal reports presumably coming soon, I'm reaching out to make a time in the coming weeks for Dr. Swanson and Dr. Bonneau to sit for depositions.

I would propose the 26th or some later date that week. I'd also suggest that a virtual deposition would make some sense, among other reasons considering the locations of the experts.

Please do let us know when they might be available.

Thanks,

Ari